

ANDERSON KILL P.C.

Attorneys and Counselors at Law

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January 2, 2014

By ECF

Hon. Henry B. Pitman
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: Sea Trade Maritime Corp. & George Peters v. Stelios
Coutsodontis, No. 09 Civ. 488(LGS)(HBP)

Dear Judge Pitman:

I write on behalf of Anderson Kill P.C. to request an extension of time in which to reply to defendant's opposition to Anderson Kill's Petition to Enforce Attorney's Lien and Judgment in the above-referenced matter. In response to my December 4, 2013 letter requesting a reply deadline of January 3, 2014, you ordered that reply papers are to be submitted by January 6, 2014 [107] (copy enclosed). We respectfully request a one-week extension, such that our reply papers would be due January 13, 2014, in light of issues which arose in other cases over the holidays that required (and continue to require) immediate attention.

Because there is no hearing set on the petition, the requested extension should have no effect on Defendant, nor on the Court's handling of this petition. However, counsel for Defendant just replied to my inquiries concerning the requested extension, stating "While we normally consent to such requests, given the fact that you have already been granted one prior reply extension by the Court, we cannot voluntarily consent to your request." (See enclosed email dated January 2, 2014.)

In fact, this is our first request for an extension. My letter of December 4, 2013 simply requested that the Court allow a reply, because its initial scheduling order [105] set a time for Defendant's opposition but did not mention reply papers.

Thank you for your attention to this matter.

Sincerely,



Edward J. Stein

EJS

cc: Via ECF to Counsel of Record

New York, NY ■ Ventura, CA ■ Stamford, CT ■ Washington, DC ■ Newark, NJ ■ Philadelphia, PA

USDC SDNY
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Edward J. Stein, Esq.
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December 4, 2013

By ECF

Hon. Henry B. Pitman
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: Sea Trade Maritime Corp. & George Peters v. Stelios
Coutsodontis, No. 09 Civ. 488(LGS)(HBP)

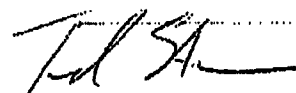
Dear Judge Pitman:

I write in response to your Order [105] in the above-referenced action entered today, which granted in part Defendant's Letter Motion for Conference [103] to the extent it sought a briefing schedule, by ordering Defendants to serve and file their opposition papers no later than December 20, 2013, and denied Defendants' Letter Motion in all other respects.

The purpose of this letter is to respectfully request that Anderson Kill P.C. be permitted to submit papers replying to any such opposition, with reply papers to be served and filed no later than January 3, 2014, given the holidays.

Thank you for your attention to this matter.

Sincerely,


Edward J. Stein

EJS

cc: Via ECF to Counsel of Record

ANDERSON ~~KILL~~ KILL
SHALL SUBMIT ITS REPLY BY
1-5-14.

SO ORDERED


HENRY PITMAN
UNITED STATES MAGISTRATE JUDGE

12-5-13

New York, NY ■ Ventura, CA ■ Stamford, CT ■ Washington, DC ■ Newark, NJ ■ Philadelphia, PA

1023723.1

Stein, Edward J.

From: Scott R. Johnston <sjohnston@polestublin.com>
Sent: Thursday, January 02, 2014 1:55 PM
To: Stein, Edward J.
Subject: RE: Sea Trade / Anderson Kill

Dear Mr. Stein:

While we normally consent to such requests, given the fact that you have already been granted one prior reply extension by the Court, we cannot voluntarily consent to your request.

Best regards,

Scott R. Johnston

Scott R. Johnston, Esq.
Poles Tublin Stratakis & Gonzalez, LLP
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New York, New York 10006-2288

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From: Stein, Edward J. [<mailto:Estein@andersonkill.com>]
Sent: Tuesday, December 31, 2013 12:27 PM
To: Scott R. Johnston Esq. (sjohnston@polestublin.com)
Subject: Sea Trade / Anderson Kill

Scott –

I'll be asking the court for a week's extension on Anderson Kill's reply to Capt. Coutsodontis's opposition to our fee petition, from January 6 to January 13, 2013.

As far as I know (and I just checked ECF) there is no hearing set on the petition, so the requested extension would not have any impact. But please let me know whether you have any objection to the request.

Thanks for any courtesy you can extend here, and best wishes for the New Year.

--Ted Stein
Anderson Kill PC
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PS - I called your office earlier and understand you're away. This repeats a message just left on your voicemail; no need to listen if you get this first.

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